

#### REMARKS/ARGUMENTS

Claims 33-40 are currently pending in the present application. In the instant Office Action, the Examiner has rejected claims 33-40 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,938,031 to Zoltan et al. Claim 40 has also been rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite.

Applicants have amended claim 40 to address the Examiner's rejection and, therefore, requests withdrawal of the rejection under 35 U.S.C. § 112, second paragraph.

Applicants submit the remaining claims without amendment and respectfully request reconsideration of the present application.

'A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.' See MPEP § 2131 (quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

Claim 33 has been amended to state that the mapping module comprises 'a content map comprising one or more content map entries, each content map entry comprising a unique identifier and one or more record chunks associated with the unique identifier, each of the record chunks comprising a binary data object, and at least one index map comprising one or more index map entries, each index map entry comprising a unique identifier corresponding to one or more record chunks maintained in the content map and one or more record attribute values of the record chunks.' Similarly, claim 36 teaches a system where the content map stores message payloads and payload identifiers, and the index map stores payload identifiers and attribute values. Accordingly, for a given record, there exists an index map entry including a unique identifier and attributes of the record, while the content map entry includes the unique identifier and one or more binary data objects associated with the unique identifier.

Zoltan does not teach a content map and an index map including the respective entries

defined above. According to the Examiner, Zoltan's data table is equivalent to the content map, while Zoltan's change table is equivalent to the index map. See Office Action at 6-7. However, as the Examiner admits, Zoltan's change table merely includes entries that are used to replace, modify or delete corresponding entries of the data table, as indicated by the same row identifiers. Office Action at 7, lines 7-9. In the claimed subject matter, the content map entries include a unique identifier associated with one or more record chunks, while the index map entries include a unique identifiers associated with attributes of the record chunks.

Furthermore, some of the Examiner's reasoning is illogical and inconsistent. For example, the Examiner alleges that Zoltan teaches receiving both record attributes and record chunks from a client node. To support this, the Examiner alleges that changes received from a client are stored in the change table. See Office Action at 7, lines 16-21. As Zoltan teaches, however, a replication agent processes change table entries to modify the data table. Accordingly, Zoltan does not teach receiving both record chunks and record attributes from a client node. Rather, data representing additions, changes or deletions to the data table are received from a client and stored in the change table, and the replication agent processes the change table entries to modify the data table. Zoltan does not teach a system where a client messages result in attributes being sent to an index map, and record chunks associated with the attributes to a content map.

The Examiner also incorrectly conflates 'second client node' with additional databases of Zoltan. See Office Action at 8. As claim 34 makes clear, the second database of Zoltan is largely equivalent to the 'at least one other distributed data repository node' and not a second client node. The Examiner's inconsistent reasoning is further manifest in the rejection claim 34, where the Examiner alleges that the sharing of change table data among replication agents meets both the limitations of streaming received record chunks to a second client node AND synchronizing attribute values with other repository nodes.

Still further, in maintaining the rejections based on Zoltan, the Examiner also makes certain untenable allegations. For example, relying on Col. 13, lines 40-44 & Col. 15, lines 15-30, the Examiner alleges that the row identifiers in Zoltan are provided to a client node. See Office Action at 7. To support this allegation, the Examiner states 'Zoltan also teaches requests to add or delete rows into or from a table, are received at node 101a.' At Col. 13, lines 40-44, however, Zoltan merely

teaches that a processor 406 may receive a request to add or delete a row. At Col. 15, lines 15-30, Zoltan merely teaches that 1) modified or deleted rows are stored in a change table with a row identifier, 2) the database replication agent 416 may distribute the change table information to another database, and 3) the database replication agent may receive change table information from other databases. Neither of the cited sections support the Examiner's contention that the row identifier is received at a client node (e.g. node 101a of Zoltan). Rather, as Applicants have previously pointed out Zoltan discloses that row identifiers are abstracted away from client applications and specifically *not* provided to client nodes. Zoltan actually goes to great lengths to employ a logical data structure 424a to hide the details of the row identifiers to client applications, since the client applications may have difficulty handling them (See Zoltan, Col. 15, lines 31-44; and generally Cols. 15 to 16 (discussion of operation of logical structure 424a)).

In light of the foregoing, Applicant believes that all currently pending claims are presently in condition for allowance. Applicant respectfully requests a timely Notice of Allowance be issued in this case. If the Examiner believes that any further action by Applicant is necessary to place this application in condition for allowance, Applicants request a telephone conference with the undersigned at the telephone number set forth below.

Respectfully Submitted,  
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